

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|                          |   |                          |
|--------------------------|---|--------------------------|
| UNITED STATES OF AMERICA | ) |                          |
|                          | ) |                          |
|                          | ) |                          |
| v.                       | ) | Criminal No. 04-1732-CBS |
|                          | ) |                          |
|                          | ) |                          |
| ROBERTO SOLORIO          | ) |                          |

DEFENDANT'S MOTION TO MODIFY WORDING OF RELEASE CONDITIONS

The defendant Roberto Solorio respectfully moves this Court to amend his release conditions by modifying the wording of his travel restriction. The defendant resides in Fair Oaks, California and is being supervised by the Sacramento Pretrial Services Office. Counsel has spoken with Mr. Phil Davis, a supervisor at the Sacramento Pretrial Services office regarding the wording of Mr. Solorio's travel restriction. Mr. Davis requests that the restriction be rephrased in the following manner: "The defendant's travel is to be restricted to the Eastern District of California and the District of Massachusetts without the prior approval of Pretrial Services." Such wording phrases the restriction in terms of judicial districts, which is desirable from the viewpoint of Pretrial Services. This wording would also allow Mr. Solorio to travel freely within the judicial district in which he is being supervised to look for employment in the wine industry, and would allow him to search for employment in the Northern District of California, which includes

Napa and Sonoma counties, provided he gets the express consent of his Pretrial Services officer to travel there first.

Undersigned counsel has conferred with Assistant United States Attorney Robert Peabody regarding ths motion and represents that he has no objection to this modification of the defendant's release conditions.

ROBERTO SOLORIO  
By his attorney,

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/s/ Syrie D. Fried  
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